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April 5, 2021

Honorable Judge Kenneth M. Karas
United States District Judge
Southern District of New York
United States Courthouse
300 Quarropas Street
White Plains, New York 10601

Re: Trustees of the District Council 9 et al., v. American Venture Construction LLC
Docket No. 21-CIV-00737 (KMK)

Dear Honorable Judge Karas:

We represent the Plaintiffs in the above referenced matter.

We recently received a Notice of Petition in the United States Bankruptcy Court District of New Jersey under Chapter 11 bearing Case Number 21-12650 filed by the Defendant, American Venture Construction LLC.

Accordingly, Plaintiffs respectfully request that the above action be stayed or placed on an inactive status pending the final outcome of the pending bankruptcy proceeding with leave for Plaintiffs to re-open the matter upon written request if the bankruptcy case is dismissed. If the debt is discharged or the debt becomes part of a plan of reorganization "So Ordered" in Bankruptcy Court, Plaintiffs will file a voluntary notice of dismissal.

Thank you for your assistance and courtesies.

Granted. The case will put on inactive status pending the final outcome of the bankruptcy proceeding with leave for Plaintiffs to re-open the case if the bankruptcy case is dismissed.

So Ordered.

4/5/21

Sincerely,


Dana L. Henke

cc: Karen M. Hertz, Esq., karen@hertzlegal.com
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Attorneys for the Defendant/Debtor